

1 **EXHIBIT 29**

2 **UNITED STATES DISTRICT COURT**

3 **DISTRICT OF NEVADA**

4  
5 **DREW J. RIBAR,**  
Plaintiff, Pro Se  
6 3480 Pershing Ln  
7 Washoe Valley, NV 89704  
(775) 223-7899  
8 Const2Audit@gmail.com



9 v.

10 **WASHOE COUNTY, et al.**

11 Case No.: 3:24-cv-00526-ART-CLB

13 **EXHIBIT 29**

15  
16 **Title:** Video Recording of June 15, 2024, Drag Queen Story Hour at North Valleys Library

17 **Date of Recording:** June 15, 2024

18 **Source:** Plaintiff's Personal Recording

19 **Format:** Digital Video File (MP4) – Submitted on USB/DVD

20 **Bates Number Range:** Video 3

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26 **DESCRIPTION OF EXHIBIT**

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28 PLEADING TITLE - 1

1 This exhibit is a **video recording** of the **June 15, 2024 Drag Queen Story Hour (DQSH)** event  
2 at **North Valleys Library**. The footage documents:

- 4 • **Unlawful public access restrictions** imposed by Washoe County Library officials.
- 5 • **Trespassing orders issued without legal justification** in a public space.
- 6 • **Library staff acting outside their authority** to enforce policies beyond their legal  
7 jurisdiction.
- 9 • **Assault against Plaintiff by Washoe County Librarian Thanh Nguyen.**

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## 11 **TIMELINE OF INCIDENTS CAPTURED**

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### 14 **I. Unlawful Public Access Restrictions & Trespassing by Library Staff**

- 16 • T/S 0:04:08 – Library Manager **Jonnica Bowen** and Assistant Director **Stacy McKenzie**  
17 enforcing Library “code of conduct” **in the strip mall parking lot**, an area outside the  
18 library’s jurisdiction.
- 20 • T/S 0:05:30 – Library Manager **Jonnica Bowen** **trespasses** an individual from the  
21 **public parking lot**, which is not under library control.
- 23 • T/S 0:12:15 – Library Manager **Jonnica Bowen** **trespasses** **Fred Myer** from the public  
24 parking lot without articulable suspicion.
- 26 • T/S 0:13:35 – Library Manager **Jonnica Bowen** **orders Plaintiff** to move to another  
27 location to film, restricting his right to record a **public event in a public space**.

### 28 **II. Police Response & Confirmation of Plaintiff’s Right to Access the Library**

- 1     • T/S 0:15:21 – Reno Police arrive at the North Valleys Library in response to calls from
- 2         library staff.
- 3     • T/S 1:01:06 – Reno Police Sergeant Catalano confirms that Plaintiff has the legal
- 4         right to enter the library once it opens to the public.
- 5     • T/S 1:09:01 – Plaintiff checks the posted library hours to confirm that the library is
- 6         scheduled to be open to the public.
- 7     • T/S 1:09:07 – Plaintiff puts his hand on the right-side entry door and finds it locked,
- 8         while placing his left foot into the opening of the left-side entry door.

### 11 III. Assault Against Plaintiff by Librarian Thanh Nguyen

- 13     • T/S 1:09:11 – Washoe County Librarian Thanh Nguyen physically assaults Plaintiff
- 14         by forcefully yanking the library door shut 3 times on Plaintiff while yelling “NO,”
- 15         causing injury to Plaintiff’s leg.
- 16     • Video confirms Plaintiff was lawfully attempting to enter the library, and Nguyen’s
- 17         physical force was unprovoked and unjustified, constituting assault and battery
- 18         under NRS 200.481.

### 21 RELEVANCE TO THE CASE

#### 24 ✓ First Amendment Violations

- 26     • Plaintiff’s right to document public events was unlawfully restricted.
- 27     • Selective enforcement of trespass policies to suppress Plaintiff’s speech.

1     • Library officials denied Plaintiff entry despite Reno Police confirming his right to  
2         enter.

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4     ✓ **Fourth Amendment Violations**

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6     • Plaintiff and others were unlawfully trespassed from a public parking lot.  
7     • Washoe County Library employees acted beyond their legal authority.

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9     ✓ **Assault & Battery (NRS 200.481) – Thanh Nguyen’s Physical Attack on Plaintiff**

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11     • Plaintiff suffered physical injury due to Nguyen’s intentional and aggressive  
12         conduct.  
13     • The video provides indisputable evidence of the assault.

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15     ✓ **Refutes BOC’s Motion to Dismiss – Establishes State Actor Nexus**

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17     • Library officials—not private actors—enforced the trespassing orders.  
18     • Establishes state action under Lugar v. Edmondson Oil Co., 457 U.S. 922 (1982).

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20     ✓ **Supports Monell Liability – Systematic Constitutional Violations by Washoe County**

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22     • Pattern of unconstitutional policies and deliberate retaliation against Plaintiff.  
23     • Confirms County’s liability under Monell v. Dep’t of Soc. Servs., 436 U.S. 658  
24         (1978).

1 **CERTIFICATION & SIGNATURE**

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3 I, **Drew J. Ribar**, certify that the attached Exhibit 29 is a **true and correct copy** of video  
4 evidence submitted in support of Plaintiff's **First Amended Complaint**.

5  
6 Dated: **March 17, 2025**

7 **Respectfully Submitted,**

8 **/s/ Drew J. Ribar**  
9 **Drew J. Ribar, Pro Se**  
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